

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL NO. 04-10361-NG  
 )  
 JOHN HANDY )

MOTION FOR LEAVE TO FILE MEMORANDUM RE:  
DUAL PROSECUTION ISSUES LATE

Defendant, John Handy, requests leave to submit his memorandum in response to the Court's August 1, 2006 request for briefing late. As reasons therefore, defendant states that the Court previously allowed counsel a two-day extension (to August 16, 2006) of the time to file because of unexpected emergent issues in other cases counsel is currently handling. The Court's Order raised far-reaching issues requiring far more research than counsel had initially anticipated. Counsel was thus unable to file the memorandum by the close of business on August 16, 2006. The motion has been electronically docketed this morning.

Counsel therefore requests leave to file the memorandum late.

JOHN HANDY  
By His Attorney:

/s/ Timothy G. Watkins  
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on August 17, 2006.

/s/ Timothy G. Watkins  
Timothy G. Watkins